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**COUNSEL FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>In re:</b>		<b>Chapter 11</b>
<b>SPHERATURE INVESTMENTS LLC, et</b>	§	<b>Case No.: 20-42492</b>
<b>al.</b>	§	
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>Jointly Administered</b>
	§	

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**AGREED MOTION TO  
CONTINUE MAY 18, 2021 HEARING**

Spherature Investments LLC (“**Spherature**”), together with its affiliates identified herein, as debtors and debtors-in-possession (collectively, the “**Debtors**”), hereby file this *Agreed Motion to Continue May 18, 2021 Hearing* (the “**Motion to Continue**”). In support of the Motion to Continue, the Debtors respectfully state as follows:

**I.**

**RELIEF REQUESTED**

1. On December 21, 2020 (the “**Petition Date**”), the Debtors filed their respective voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the

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<sup>1</sup> The “**Debtors**” in the above-captioned jointly administered chapter 11 bankruptcy cases (“**Cases**”) are: Spherature Investments LLC EIN#5471; Rovia, LLC EIN#7705; WorldVentures Marketing Holdings, LLC EIN#3846; WorldVentures Marketplace, LLC EIN#6264; WorldVentures Marketing, LLC EIN#3255; WorldVentures Services, LLC EIN#2220.

“**Bankruptcy Code**”), thereby initiating the above-captioned cases (the “**Cases**”).

2. On December 22, 2020, the Debtors filed their *Emergency Motion for an Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* (the “**Cash Collateral Motion**”) [Docket No. 18].

3. On January 21, 2021, the Debtors filed their *Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling and Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; (IV) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief* (the “**Bid Procedures Motion**”) [Docket No. 92].

4. On April 29, 2021, the Honorable Brenda T. Rhoades, Chief Bankruptcy Judge for the United States Bankruptcy Court for the Eastern District of Texas (the “**Court**”) set the Cash Collateral Motion and Bid Procedures Motion for a hearing (the “**Hearing**”) on May 18, 2021, at 10:00 AM (CT) [Docket No. 265].

5. Counsel for the Debtors respectfully request that the Hearing scheduled for May 18, 2021, at 10:00 AM (CT) be continued and rescheduled to **June 8, 2021, at 2:00 PM (CT)**, or another date and time of the Court’s convenience. This Motion to Continue is not made for delay purposes. But instead it is made to promote efficiency and so that justice might be served. Counsel for the Debtors has conferred with counsel for the secured lenders, counsel for the Official Committee of Unsecured Creditors (the “**UCC**”), counsel for Melody Yiru, counsel for Raymond Braun, Janie Braun, Braun Marketing Company, Matt Morris, Rhonda Morris, Dr. Troy Brown, Kathy Brown, Kari Schneider, Lisha Schneider, Byron Schrag, and Martin Ruof, and counsel for

Seacret Direct, LLC. Seacret Direct, LLC's counsel is unavailable on June 8, 2021. So the parties may need a further continuance to a date as close to June 8, 2021 as possible.

## II.

### NOTICE

6. No trustee, examiner, or committee has been appointed in these Cases. This Motion to Continue has been provided to: (i) the Office of the United States Trustee; (ii) to each of the Debtors' secured lenders; (iii) counsel to the agents of the Debtors' secured lenders; (iv) counsel to the Official Committee of Unsecured Creditors; (v) the forty (40) largest unsecured creditors of each the Debtors, as applicable; (vi) the Internal Revenue Service; and (vii) all parties in interest who have formally appeared and requested notice. The Debtors respectfully submit that no further notice of this Motion is required.

7. The pleadings in these Chapter 11 Cases and supporting papers are available on the Bankruptcy Court's website at <https://ecf.txeb.uscourts.gov/> and on the Debtors' claims agent's website at <https://cases.stretto.com/Spherature>. You can also request any pleading you need from the Debtors' counsel at: McDermott Will & Emery LLP, c/o Marcus Helt, Esq., 2501 North Harwood Street, Suite 1900, Dallas, Texas 75201 ([mhelt@mwe.com](mailto:mhelt@mwe.com)).

## III.

### CONCLUSION

**WHEREFORE**, the Debtors respectfully request the Court (1) reschedule and continue the Hearing on the Cash Collateral Motion and Bid Procedures Motion to June 8, 2021, at 2:00 PM (CT), or another date and time of the Court's convenience, and (2) grant such other relief to which the Debtors may be entitled.

Respectfully Submitted,

Dated: May 14, 2021

/s/ Marcus A. Helt

Marcus A. Helt, Esq.

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**COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 14, 2021, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Marcus A. Helt

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